IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

VERNON HAMMETT and JUDITH HAMMETT Plaintiffs, v. DEUTSCHE BANK NATIONAL TRUST COMPANY, ET AL, Defendants.	)))))))))))	Case No. 1:09-cv-01401-LO-JFA

ANSWER

Comes now Dewey B. Morris ("Morris"), by counsel, and sets forth the following as and for his response and answer to the Complaint.

PARTIES

1. Morris has insufficient information and/or knowledge to admit the allegations contained in paragraphs 1-7 of the Complaint and therefore denies them.

2. In response to paragraph 8, Morris admits that he was named as Trustee on certain Deeds of Trust securing indebtedness to Encore Credit Corporation. Morris did not prepare the referenced Deed of Trust or participate in any way in the closing of the transaction secured by the Deed of Trust. Morris therefore has no personal knowledge that he is named as Trustee on the Deed of Trust that is the subject of this suit and therefore denies the allegations contained in this paragraph of the Complaint. Morris admits that he is a resident of the Commonwealth of Virginia and resides in Richmond. To the extent that paragraph 8 alleges any other facts, they are denied.

3. Morris has insufficient information and/or knowledge to admit the allegations contained in paragraphs 9-10 of the Complaint and therefore denies them.

4. Paragraphs 11-12 contain conclusions of law to which no response is necessary. To the extent that paragraphs 11-12 allege any facts, they are denied.

5. Morris has insufficient information and/or knowledge to admit the allegations contained in paragraphs 13-14 of the Complaint and therefore denies them.

6. In response to paragraph 15, Morris admits that he was named as Trustee on certain Deeds of Trust securing indebtedness to Encore Credit Corporation. Morris did not prepare the referenced Deed of Trust or participate in any way in the closing of the transaction secured by the Deed of Trust. Morris therefore has no personal knowledge that he is named as Trustee on the Deed of Trust that is the subject of this suit and therefore denies the allegations contained in this paragraph of the Complaint.

7. Morris has insufficient information and/or knowledge to admit the allegations contained in paragraphs 16-134 of the Complaint and therefore denies them and calls for strict proof thereof.

WHEREFORE, Dewey B. Morris respectfully prays that this Court not take any action adverse to him and that he be awarded such other relief as the Court deems appropriate.

DEWEY B. MORRIS, TRUSTEE

By Counsel

__/s/________________________________
Robert R. Musick, Esquire (VSB #48601)
*Thompson*McMullan, P.C.
100 Shockoe Slip
Richmond, Virginia 23219
Phone: (804) 649-7545
Fax: (804) 780-1813
bmusick@t-mlaw.com

CERTIFICATE OF SERVICE

I certify that on this 23rd day of February, 2010, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all parties of record.

__/s/________________________________
Robert R. Musick, Esquire (VSB #48601)
*Thompson*McMullan, P.C.
100 Shockoe Slip
Richmond, Virginia 23219
Phone: (804) 649-7545
Fax: (804) 780-1813
bmusick@t-mlaw.com
Counsel for Dewey B. Morris